

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:)	
)	
SIBAHAM LTD. f/k/a)	CASE NO.: 19-31537
MAHABIS LIMITED)	MOTION IN SUPPORT OF
)	
)	APPLICATION/DECLARATION
)	FOR SPECIAL ADMISSIONS
	/	

The Undersigned Counsel, Attorney Paul S. Rothstein, moves this Court for entry of an Order to grant him Special Admission status in the above-styled case and in support of this Motion, states:

1. Local Rule 2090-2(b)(2) allows for Special Admission “where the amount in controversy or the importance of the case do not appear to justify double employment of counsel.” By granting Special Admission status, Undersigned Counsel would not have to associate local counsel.
2. The circumstances of this case warrant Undersigned Counsel be granted Special Admission.
Undersigned Counsel represents the Objecting Parties, Penwah and Dennis Thomas.
Undersigned Counsel has represented them in trying to resolve their claims against the Debtor in UK Proceeding.
3. Undersigned Counsel has received notice of these proceedings on Thursday, December 19, 2019.
The emergency nature of these proceedings requires Undersigned Counsel to prepare appropriate response documents in an expedited fashion.
4. Undersigned Counsel will file motions to vacate entered orders and request for other relief by Tuesday, December 24, 2019. Those documents confirm that Undersigned Counsel received no prior notice of these proceedings before entry of the orders. Moreover, In the summer of 2019, Mr. Rothstein began communications with Gareth Roberts at KRE Corporate Recovery LLP.

Administrator/Liquidator for SIBAHAM LTD. (F/K/A MAHABIS LTD.). On September 4, 2019, Mr. Rothstein's office transmitted a formal pre-suit demand, including over 500 complaints regarding the product subject of the Complaint, a draft class action complaint and a detailed description of the liability and damage alleged. On September 10, 2019, Mr. Roberts emailed Mr. Rothstein's office and said: "We have discussed this matter with our solicitors and they will be responding to you in due course." Mr. Rothstein followed up with an email that same day, on September 10, 2019. Since September 10, 2019, Mr. Rothstein has received no further communication from Mr. Roberts until a copy of the Chapter 15 Order was sent via Federal Express Overnight Mail.

5. Undersigned Counsel Application/Declaration for Special Admissions in these proceedings is attached and made a part of this Motion as Exhibit 1.
6. **WHEREFORE**, Undersigned Counsel, Paul S. Rothstein requests that this Court enter an Order granting him Special Admissions status.

Dated December 23, 2019

Respectfully submitted,

/s/Paul S. Rothstein Special Admission Status Requested

Attorney Paul S. Rothstein

Fl. Bar. No. 310123

Penwah and Dennis Thomas

Attorney Paul S. Rothstein, P.A.

626 N.E. 1st Street

Gainesville, FL 32601

(352)376-7650

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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of December 2019, the foregoing **UNDERSIGNED COUNSEL'S MOTION IN SUPPORT OF APPLICATION/ DECLARATION FOR SPECIAL ADMISSIONS** and a copy of has been served on all Parties required to be served by electronically filing with the Clerk of the Court of the U.S. Bankruptcy Court of the Western, District Court of North Carolina by using the CM/ECF system.

/s/ Paul S. Rothstein

Paul S. Rothstein

EXHIBIT 1

APPLICATION/DECLARATION FOR SPECIAL ADMISSIONS

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:)	
)	Case No. 19-31537
SIBAHAM LIMITED f/k/a)	Chapter 15
MAHABIS LIMITED)	
)	Application/Declaration for
)	Special Admission
Debtor in a Foreign Proceeding.)	

(1) Name. Paul S. Rothstein
 First Middle Last

(2) Residence. I reside in the following state: Florida

(3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

Firm name: Attorney Paul S. Rothstein P.A.
 Mailing address: 626 N.E. First Street City/State/Zip: 32601
 Telephone number: (352) 376-7650
 Facsimile number: (352) 374-7133
 E-mail address: psr@rothsteinforjustice.com
 (Application will not be considered without an e-mail address to receive electronic notification.)

(4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of North Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States Bankruptcy Court for the Western District of North Carolina. I consent to the jurisdiction of the United States Bankruptcy Court for the Western District of North Carolina in all matters of attorney conduct.

(5) I am a member in good standing of the Northern District of Florida, proof of which will be filed on December 24, 2019.

Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court	Date of Admittance	Good Standing
Middle District of Florida	4/30/1981	Yes

Northern District of Florida	10/6/1982	Yes
11th Circuit Court of Appeals	10/20/1989	Yes
5th Circuit Court of Appeals	12/8/2008	Yes
2nd Circuit Court of Appeals	11/21/2012	Yes
Northern District of California	1/23/2013	Yes
9th Circuit Court of Appeals	6/26/2013	Yes
District Court of Colorado	7/11/2014	Yes
Southern District of Texas	8/21/2014	Yes
10th Circuit Court of Appeals	10/17/2014	Yes
Northern District of Illinois	02/8/2018	Yes
Southern District of California	8/20/2015	Yes
Southern District of Florida	3/31/2017	Yes
Supreme Court of Ohio	7/5/2017	Yes
3rd Circuit Court of Appeals	7/25/2017	Yes

- (6) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? ☐ Yes ☐ XNo
- (7) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?
☐ Yes ☐ XNo
- (8) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?
☐ Yes ☐ X No
- (9) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of North Carolina or another court in the state of North Carolina?
☐ Yes ☐ X No
- (10) Electronic Notification. By submitting this application, I consent to electronic notification.
- (11) Represented Party/Parties. I seek to represent the following party/parties:
 Penwah Thomas and Dennis Thomas

The statements contained in this two page Declaration for Special Admission are made under penalties of perjury and are of personal knowledge and true and correct.

By:/s/ Paul S. Rothstein
 Signature of Applicant

UNITED STATES DISTRICT COURT

**NORTHERN DISTRICT OF FLORIDA
OFFICE OF THE CLERK**

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Reply to: Gainesville Division

December 20, 2019

CERTIFICATE OF GOOD STANDING

I, JESSICA J. LYUBLANOVITS, Clerk of the United States District Court for the Northern District of Florida, DO HEREBY CERTIFY THAT **Paul Stuart Rothstein**, **Florida Northern District Bar Number 310123**, was duly admitted to practice in this Court on **October 6, 1982**, and is in good standing as a member of the Bar of this Court.

JESSICA J. LYUBLANOVITS

CLERK OF COURT



BLAIR PATTON, DEPUTY CLERK

The mission of the Office of the Clerk of the Northern District of Florida is to provide superior service to the public and the Court.

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